<u>REMARKS</u>

Claims 1-44 are pending in this application. All but claims 3, 21 and 37 have been rejected under 35 U.S.C. §102(e) in view of US Patent 6,839,707 to Lee. The Office has indicated that claims 3, 21 and 37 would be allowable if rewritten in independent form. Applicant will defer taking action on claims 3, 21 and 37 until the Office has had a chance to considered Applicant's amendments above and remarks below.

<u>Claims 1, 19 and 43</u>

Despite the Office's assertion to the contrary, the Lee patent does not show, nor does it even suggest, receiving "an insert request to insert data into" a database table, "where the insert request includes one or more links" that each "indicates a server connection and a storage location for data corresponding to the link," as claimed. Likewise, Lee neither shows nor suggests "opening the corresponding server connection for each link," "requesting the data" that corresponds to each link, "receiving the requested data," and then "storing the received data" in the table. Put another way, Lee says nothing about performing database inserts by providing with the insert request not the data to be inserted into the table itself, but instead a link to "a server connection" and "a storage location" at which the data is stored.

The manner in which updates are performed in Lee's "database server 16" is described in so little detail that no person of ordinary skill could possibly conclude that the insert requests received by the server include links like those claimed by Applicant. There is nothing in Lee, in fact, that suggests that the database server is anything other than a traditional database server that receives, along with each insert request, the actual data to be inserted into the "database 20." To the contrary, Lee seems to suggest that the database server is indeed of the traditional variety, in which any update it receives from the "client system 14" includes with it the "new or revised information" that is to be loaded into the database. (Col. 11, lines 32-35.) Lee states very plainly, in fact, that, in dealing with the "client system 14," "[t]he updated information 954 is received 956 by server system 12 for storing 958 in database 20." (Col. 11, lines 38-40.) In other words, the "server system 12" (which includes the "database server 16") receives from the client system both the insert request and the data to be inserted. In any event, Lee says nothing about receiving with each insert request "one or more links" that indicate "a server connection

9

and a storage location for data" to be inserted into the database. Accordingly, claims 1, 19 and 43, as well as the claims that depend from them, all are patentable over Lee.

Claim 13

As with claims 1, 19 and 43 above, Lee does not show nor suggest the elements of claim 13. In particular, Lee does not show, nor does he suggest, "obtaining one or more links" that each "indicates a server connection and a storage location for" data to be stored in a "corresponding field" of a database table, nor does he show "providing" to the database system "a request . . . to load data into the table" that "includes the obtained links." As discussed above, Lee's "database server 16" is a traditional database server that receives with each request the data to be loaded into the table and not a "link" that "indicates a server connection and a storage location" for that data, as claimed. Accordingly, claim 13 and the claims that depend from it all are patentable over Lee.

Claim 31

Claim 31, as amended, recites "a database management component" that loads data into "data storage facilities after receiving one or more links in a request from a client system, where each link indicates a server connection and a storage location for the data to be loaded." As discussed above, Lee does not show, nor does he even suggest, a database system that receives requests that include links like those claimed. Accordingly, claim 31 and its dependents all are patentable over Lee.

The Amendment to Claim 43

Applicant points out that the amendment to claim 43 (changing the word "update" to "insert" in line 2) is not made for any reason related to prior art. Rather, Applicant made this change to ensure proper antecedent basis for the term "insert request" appearing in line 3 of the claim.

CONCLUSIONS

All of the claims in this application are allowable over the art of record. Applicant therefore asks the Office to withdraw the rejections and allow all of the claims. Please apply any charges that might be due, excepting the issue fee but including fees for extensions of time, to deposit account 14-0225.

Respectfully,

John D. Cowart
Reg. No. 38,415

NCR Corporation
1700 South Patterson Blvd.
Dayton, Ohio 45479-0001

Tel. No. (858) 485-4903
Fax No. (858) 485-3255

11